

# INVOICE Date: 11/27/2023 Due Upon Receipt

# **Brustein Law**

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Santiago Quezada Sr. c/o Law Offices of Martin E. Restituyo 1325 Avenue of the Americas, 28th Floor New York, New York 10019

# Pizarro v Euros El Tina, et al 20-cv-5783 (AKH)

#### **Services**

Туре	Date	Notes	Quantity	Rate	Total
Service	01/10/2020	client intake	2.00	\$550.00	\$1,100.00
Service	01/13/2020	reviewing client intake form	0.80	\$550.00	\$440.00
Service	01/13/2020	researching Euros El Tina	0.60	\$550.00	\$330.00
Service	01/14/2020	drafting demand letter	1.50	\$550.00	\$825.00
Service	01/14/2020	client communication re: Defendants answer	2.50	\$550.00	\$1,375.00
Service	01/15/2020	reviewing demand letter w client	0.70	\$550.00	\$385.00
Service	01/19/2020	communications w client	0.50	\$550.00	\$275.00
Service	02/25/2020	reviewing documents re: sale of business	0.80	\$550.00	\$440.00
Service	03/04/2020	witness interview	1.00	\$550.00	\$550.00
Service	03/18/2020	call w client	1.00	\$550.00	\$550.00
Service	03/30/2020	drafting EEOC complaint	1.40	\$550.00	\$770.00
Service	04/22/2020	call w client	1.10	\$550.00	\$605.00
Service	04/27/2020	reviewing bank records	0.80	\$550.00	\$440.00

Service	06/19/2020	communication with client	0.30	\$550.00	\$165.00
Service	07/07/2020	drafting federal complaint	5.70	\$550.00	\$3,135.00
Service	07/15/2020	revising complaint	2.10	\$550.00	\$1,155.00
Service	07/22/2020	call w client	1.10	\$550.00	\$605.00
Service	07/24/2020	filing federal complaint	0.20	\$550.00	\$110.00
Service	08/03/2020	requesting summonses	0.20	\$550.00	\$110.00
Service	08/20/2020	communication w opposing counsel	0.20	\$550.00	\$110.00
Service	08/21/2020	communication w opposing counsel	0.20	\$550.00	\$110.00
Service	08/25/2020	communication w opposing counsel	0.10	\$550.00	\$55.00
Service	10/12/2020	communication w opposing counsel	0.10	\$550.00	\$55.00
Service	10/19/2020	communication w opposing counsel	0.10	\$550.00	\$55.00
Service	10/22/2020	communication w opposing counsel	0.10	\$550.00	\$55.00
Service	10/26/2020	call w client	0.50	\$550.00	\$275.00
Service	11/19/2020	communication w opposing counsel	0.10	\$550.00	\$55.00
Service	11/29/2020	email w court	0.10	\$550.00	\$55.00
Service	11/30/2020	call w client	0.40	\$550.00	\$220.00
Service	12/02/2020	drafting initial report of parties	0.30	\$550.00	\$165.00
Service	12/03/2020	interview of Eladio Castro	0.80	\$550.00	\$440.00
Service	12/03/2020	interview of Cristian Dilone	0.70	\$550.00	\$385.00
Service	12/04/2020	initial conference	0.40	\$550.00	\$220.00
Service	12/04/2020	court call	1.00	\$550.00	\$550.00
Service	12/08/2020	revised case management plan	0.20	\$550.00	\$110.00
Service	12/09/2020	reviewing civil case management order	0.20	\$550.00	\$110.00
Service	12/11/2020	communication w client	0.50	\$550.00	\$275.00
Service	01/08/2021	reviewing ECF filings	0.20	\$550.00	\$110.00
Service	01/11/2021	reviewing Defendants answer and cross claims	1.40	\$550.00	\$770.00
Service	01/12/2021	communication w opposing counsel	0.10	\$550.00	\$55.00
Service	01/12/2021	reviewing ECF filings	0.20	\$550.00	\$110.00
Service	01/15/2021	communication w opposing counsel	0.20	\$550.00	\$110.00
Service	01/19/2021	reviewing ECF filings	0.20	\$550.00	\$110.00

Service	01/20/2021	reviewing documents re: answer	0.80	\$550.00	\$440.00
Service	01/25/2021	review counter claim with client	1.60	\$550.00	\$880.00
Service	01/25/2021	reviewing ECF filings	0.20	\$550.00	\$110.00
Service	01/26/2021	communication w opposing counsel	0.40	\$550.00	\$220.00
Service	01/27/2021	communication w opposing counsel	0.10	\$550.00	\$55.00
Service	01/27/2021	reviewing ECF filings	0.20	\$550.00	\$110.00
Service	02/11/2021	drafting motion requesting extension of time	0.30	\$550.00	\$165.00
Service	02/12/2021	reviewing court order	0.10	\$550.00	\$55.00
Service	02/22/2021	response to answer and cross claims	3.20	\$550.00	\$1,760.00
Service	02/25/2021	communication w client	0.60	\$550.00	\$330.00
Service	03/02/2021	reviewing medical documentation	0.60	\$550.00	\$330.00
Service	03/04/2021	drafting initial disclosures	1.30	\$550.00	\$715.00
Service	03/08/2021	drafting discovery demands	2.40	\$550.00	\$1,320.00
Service	03/30/2021	communication w opposing counsel	0.10	\$550.00	\$55.00
Service	04/09/2021	reviewing defendants' initial disclosures	0.40	\$550.00	\$220.00
Service	04/12/2021	reviewing Defendants discovery demands	0.60	\$550.00	\$330.00
Service	04/20/2021	drafting notices of depositions and service	0.40	\$550.00	\$220.00
Service	04/22/2021	communication w opposing counsel	0.30	\$550.00	\$165.00
Service	04/29/2021	communication w opposing counsel	0.20	\$550.00	\$110.00
Service	04/30/2021	communication w opposing counsel	0.10	\$550.00	\$55.00
Service	05/04/2021	reviewing court order	0.10	\$550.00	\$55.00
Service	05/07/2021	communication w opposing counsel	0.10	\$550.00	\$55.00
Service	05/11/2021	reviewing Emiton Fernandez filing	0.20	\$550.00	\$110.00
Service	05/12/2021	communication w opposing counsel	0.10	\$550.00	\$55.00
Service	05/13/2021	communication w opposing counsel	0.10	\$550.00	\$55.00
Service	05/13/2021	reviewing court order	0.10	\$550.00	\$55.00
Service	05/14/2021	reviewing filings re: default judgment	0.20	\$550.00	\$110.00
Service	05/20/2021	communication w opposing counsel	0.10	\$550.00	\$55.00
Service	05/21/2021	drafting deficiency letter	2.50	\$550.00	\$1,375.00
Service	05/25/2021	reviewing financial records	2.10	\$550.00	\$1,155.00

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Service	05/27/2021	reviewing and revising discovery responses	4.60	\$550.00	\$2,530.00
Service	05/27/2021	researching motion to compel	3.50	\$550.00	\$1,925.00
Service	05/28/2021	review email and documents from Mr. Rose	0.70	\$550.00	\$385.00
Service	05/28/2021	communication w opposing counsel and drafting joint letter	1.80	\$550.00	\$990.00
Service	05/28/2021	communication w opposing counsel	0.10	\$550.00	\$55.00
Service	06/01/2021	communication w opposing counsel	0.10	\$550.00	\$55.00
Service	06/02/2021	communication w client	0.80	\$550.00	\$440.00
Service	06/02/2021	communication w opposing counsel	0.10	\$550.00	\$55.00
Service	06/02/2021	communication w opposing counsel	0.50	\$550.00	\$275.00
Service	06/02/2021	reviewing Castro discovery responses	1.10	\$550.00	\$605.00
Service	06/03/2021	communication w opposing counsel	0.30	\$550.00	\$165.00
Service	06/03/2021	communication w opposing counsel	0.10	\$550.00	\$55.00
Service	06/03/2021	drafting portion of joint letter re motion to compel	0.80	\$550.00	\$440.00
Service	06/04/2021	drafting motion to compel	3.50	\$550.00	\$1,925.00
Service	06/04/2021	communication w opposing counsel	0.20	\$550.00	\$110.00
Service	06/04/2021	reviewing court order	0.10	\$550.00	\$55.00
Service	06/05/2021	supplemental discovery	0.30	\$550.00	\$165.00
Service	06/05/2021	drafting proposed order	0.60	\$550.00	\$330.00
Service	06/15/2021	communication w opposing counsel	0.20	\$550.00	\$110.00
Service	06/16/2021	communication w opposing counsel	1.70	\$550.00	\$935.00
Service	06/18/2021	reviewing court order	0.20	\$550.00	\$110.00
Service	06/21/2021	communication w opposing counsel	0.40	\$550.00	\$220.00
Service	06/22/2021	communication w opposing counsel	0.20	\$550.00	\$110.00
Service	07/03/2021	reviewing opposition memo	0.80	\$550.00	\$440.00
Service	07/03/2021	researching for reply memo	1.40	\$550.00	\$770.00
Service	07/07/2021	drafting reply memo	2.30	\$550.00	\$1,265.00
Service	07/12/2021	reviewing medical records	0.70	\$550.00	\$385.00
Service	07/12/2021	client prep	3.00	\$550.00	\$1,650.00
Service	07/20/2021	reviewing Defendants' deficiency letter	0.40	\$550.00	\$220.00

Service	07/21/2021	drafting protective order	0.80	\$550.00	\$440.00
Service	07/21/2021	communication w opposing counsel	0.10	\$550.00	\$55.00
Service	07/22/2021	client meeting	1.00	\$550.00	\$550.00
Service	07/22/2021	client prep	2.50	\$550.00	\$1,375.00
Service	07/23/2021	meet and confer	0.70	\$550.00	\$385.00
Service	07/23/2021	communication w opposing counsel	0.30	\$550.00	\$165.00
Service	07/26/2021	client communication	0.70	\$550.00	\$385.00
Service	07/26/2021	client prep	1.00	\$550.00	\$550.00
Service	07/26/2021	communication w opposing counsel	0.20	\$550.00	\$110.00
Service	07/27/2021	Pizarro deposition	6.80	\$550.00	\$3,740.00
Service	07/27/2021	client prep	1.00	\$550.00	\$550.00
Service	07/27/2021	discussion w client post deposition	0.50	\$550.00	\$275.00
Service	07/28/2021	communication w opposing counsel 0.10		\$550.00	\$55.00
Service	07/29/2021	drafting verification for interrogatories	0.20	\$550.00	\$110.00
Service	07/29/2021	1 reviewing Defendants' deficiency letter dated July 28, 0.30 2021		\$550.00	\$165.00
Service	07/29/2021	reviewing Castro Safe Harbor letter	0.30	\$550.00	\$165.00
Service	07/29/2021	communication w opposing counsel	0.20	\$550.00	\$110.00
Service	07/30/2021	reviewing Defendants responses to Castro discovery demands	0.90	\$550.00	\$495.00
Service	07/30/2021	drafting Safe Harbor letter	1.60	\$550.00	\$880.00
Service	07/30/2021	drafting response to deficiency letter	2.10	\$550.00	\$1,155.00
Service	07/30/2021	drafting Plaintiff's portion of joint letter	2.70	\$550.00	\$1,485.00
Service	07/31/2021	reviewing 235 pages of financial records	3.20	\$550.00	\$1,760.00
Service	08/03/2021	reviewing court order	0.20	\$550.00	\$110.00
Service	08/05/2021	communication w opposing counsel	0.20	\$550.00	\$110.00
Service	08/16/2021	reviewing deposition w client	0.70	\$550.00	\$385.00
Service	08/17/2021	reviewing Defendants' motion to compel	1.40	\$550.00	\$770.00
Service	08/17/2021	opposition to Defendants' motion to compel	0.90	\$550.00	\$495.00
Service	08/17/2021	reviewing Castro réponse to Defendants' motion	0.30	\$550.00	\$165.00
Service	08/17/2021	reviewing court order	0.20	\$550.00	\$110.00

Service	08/18/2021	communication w opposing counsel	0.20	\$550.00	\$110.00
Service	08/18/2021	drafting declaration	0.70	\$550.00	\$385.00
Service	08/19/2021	drafting opposition to motion to compel	3.10	\$550.00	\$1,705.00
Service	08/20/2021	continued client deposition	4.00	\$550.00	\$2,200.00
Service	08/20/2021	meeting w client before continued deposition	0.50	\$550.00	\$275.00
Service	08/20/2021	discussion w client after deposition	0.40	\$550.00	\$220.00
Service	08/25/2021	communication w opposing counsel	0.20	\$550.00	\$110.00
Service	08/25/2021	reviewing Defendants' reply memo	0.50	\$550.00	\$275.00
Service	08/26/2021	reviewing discovery w client	0.90	\$550.00	\$495.00
Service	08/26/2021	review Defendants discovery demands on Emotion	0.60	\$550.00	\$330.00
Service	08/31/2021	communication w opposing counsel	0.20	\$550.00	\$110.00
Service	09/02/2021	communication w opposing counsel	0.10	\$550.00	\$55.00
Service	09/09/2021	drafting letter to court	0.20	\$550.00	\$110.00
Service	09/09/2021	researching computer crimes	searching computer crimes 5.00		\$2,750.00
Service	09/10/2021	call w court	0.50	\$550.00	\$275.00
Service	09/15/2021	communication w opposing counsel	0.10	\$550.00	\$55.00
Service	09/24/2021	drafting motion to amend	2.40	\$550.00	\$1,320.00
Service	10/08/2021	reviewing motion to dismiss	1.30	\$550.00	\$715.00
Service	10/25/2021	reviewing opp to motion to amend	0.90	\$550.00	\$495.00
Service	11/01/2021	reviewing court order	0.10	\$550.00	\$55.00
Service	11/05/2021	communication w court	0.20	\$550.00	\$110.00
Service	11/09/2021	researching for opposition to motion to dismiss	3.40	\$550.00	\$1,870.00
Service	11/11/2021	drafting declaration for Maria	0.90	\$550.00	\$495.00
Service	11/11/2021	drafting opposition to motion to dismiss	2.20	\$550.00	\$1,210.00
Service	11/16/2021	reviewing court order	0.10	\$550.00	\$55.00
Service	11/24/2021	reviewing reply memo for motion to dismiss	0.70	\$550.00	\$385.00
Service	02/16/2022	reviewing court order	0.90	\$550.00	\$495.00
Service	02/18/2022	revising Amended Complaint	1.10	\$550.00	\$605.00
Service	03/08/2022	communication w opposing counsel	0.20	\$550.00	\$110.00
Service	03/11/2022	8/11/2022 reviewing answer		\$550.00	\$275.00

Service	03/24/2022	reviewing court order	0.40	\$550.00	\$220.00
Service	03/25/2022	drafting answer to counter claims	0.60	\$550.00	\$330.00
Service	04/29/2022	court call	0.50	\$550.00	\$275.00
Service	05/20/2022	Court Call	0.50	\$550.00	\$275.00
Service	05/20/2022	court prep	0.20	\$550.00	\$110.00
Service	05/20/2022	court update	0.10	\$550.00	\$55.00
Service	05/23/2022	call with co-counsel re: court order	0.50	\$550.00	\$275.00
Service	05/23/2022	call with client	0.20	\$550.00	\$110.00
Service	05/23/2022	review client emails	0.30	\$550.00	\$165.00
Service	05/23/2022	communication w client	0.60	\$550.00	\$330.00
Service	05/24/2022	phone call with client	0.20	\$550.00	\$110.00
Service	05/24/2022	call with co-counsel	0.10	\$550.00	\$55.00
Service	05/24/2022	RB compiled discovery	1.00	\$550.00	\$550.00
Service	05/25/2022	call with co-counsel	0.30	\$550.00	\$165.00
Service	05/25/2022	compiling evidence	0.50	\$550.00	\$275.00
Service	05/25/2022	supplemental discovery	0.20	\$550.00	\$110.00
Service	05/25/2022	supplemental disclosures	1.20	\$550.00	\$660.00
Service	05/26/2022	drafting declarations	0.30	\$550.00	\$165.00
Service	06/03/2022	reviewing Defendants' portion of draft joint letter	0.60	\$550.00	\$330.00
Service	06/06/2022	communication with client	0.10	\$550.00	\$55.00
Service	06/06/2022	communication with co-counsel	0.20	\$550.00	\$110.00
Service	06/06/2022	reviewing discovery letter from defendants	0.40	\$550.00	\$220.00
Service	06/07/2022	drafting portion of joint letter	0.80	\$550.00	\$440.00
Service	06/07/2022	drafting letter	0.40	\$550.00	\$220.00
Service	06/08/2022	drafting joint letter	1.20	\$550.00	\$660.00
Service	06/09/2022	reviewing Castro portion of draft joint letter	0.40	\$550.00	\$220.00
Service	06/10/2022	communication with opposing counsel	0.10	\$550.00	\$55.00
Service	06/10/2022	communication with co-counsel	1.00	\$550.00	\$550.00
Service	06/10/2022	drafting letter to court	0.50	\$550.00	\$275.00
Service	06/10/2022	reviewing and responding to revised portions of draft	0.90	\$550.00	\$495.00

		joint letter			
Service	06/11/2022	communication with Jesse Rose	0.20	\$550.00	\$110.00
Service	06/11/2022	reviewing various versions of joint letter	0.60	\$550.00	\$330.00
Service	06/13/2022	drafting opposition	0.50	\$550.00	\$275.00
Service	06/20/2022	call with client	0.20	\$550.00	\$110.00
Service	06/24/2022	communication with client	0.30	\$550.00	\$165.00
Service	07/25/2022	reviewing court order	0.20	\$550.00	\$110.00
Service	07/25/2022	call with co-counsel	0.50	\$550.00	\$275.00
Service	07/25/2022	reviewing court order	0.70	\$550.00	\$385.00
Service	07/26/2022	call w client	0.50	\$550.00	\$275.00
Service	07/29/2022	call with co-counsel	0.20	\$550.00	\$110.00
Service	08/01/2022	call w co-counsel	0.30	\$550.00	\$165.00
Service	02/13/2023	communication w opposing counsel and Court	0.20	\$550.00	\$110.00
Service	02/28/2023	reviewing court order	0.10	\$550.00	\$55.00
Service	03/07/2023	reviewing court order	0.10	\$550.00	\$55.00
Service	08/22/2023	reviewing Quezada deposition transcript	2.50	\$550.00	\$1,375.00
Service	08/22/2023	reviewing Quezada Jr transcript	2.20	\$550.00	\$1,210.00
Service	08/23/2023	reviewing Castro transcript	1.70	\$550.00	\$935.00
Service	08/24/2023	reviewing discovery for JPTO	3.80	\$550.00	\$2,090.00
Service	08/29/2023	reviewing plaintiff's first deposition transcript	3.10	\$550.00	\$1,705.00
Service	09/06/2023	drafting JPTO	4.20	\$550.00	\$2,310.00
Service	09/27/2023	drafting and researching motion in liming to exclude third-party claims	6.00	\$550.00	\$3,300.00
Service	09/28/2023	researching and drafting motion in limine on stolen evidence preclusion	2.80	\$550.00	\$1,540.00
Service	09/29/2023	researching and drafting motion in limine about retaliation	3.50	\$550.00	\$1,925.00
Service	09/30/2023	researching and drafting motion in limine about Quezada Sr's conviction for lying and smuggling money	6.20	\$550.00	\$3,410.00
Service	10/01/2023	drafting opening	8.00	\$550.00	\$4,400.00
Service	10/04/2023	review plaintiff's 2nd transcript	2.20	\$550.00	\$1,210.00
Service	10/04/2023	annotating Answer	0.60	\$550.00	\$330.00

Service	10/05/2023	communication w Court	0.20	\$550.00	\$110.00
Service	10/05/2023	revising proposed jury charge	3.50	\$550.00	\$1,925.00
Service	10/07/2023	drafting proposed voir dire	1.70	\$550.00	\$935.00
Service	10/09/2023	drafting opening	5.30	\$550.00	\$2,915.00
Service	10/10/2023	reviewing Euros jury charge	0.40	\$550.00	\$220.00
Service	10/10/2023	reviewing Euros pretrial memo	0.60	\$550.00	\$330.00
Service	10/10/2023	communication w opposing counsel	0.30	\$550.00	\$165.00
Service	10/10/2023	drafting direct	2.80	\$550.00	\$1,540.00
Service	10/11/2023	court conference	1.00	\$550.00	\$550.00
Service	10/11/2023	prepping with client	3.00	\$550.00	\$1,650.00
Service	10/12/2023	communication w opposing counsel	0.20	\$550.00	\$110.00
Service	10/13/2023	communication w Castro counsel	0.30	\$550.00	\$165.00
Service	10/13/2023	reviewing Defendants' exhibits	0.40	\$550.00	\$220.00
Service	10/13/2023	reviewing late discovery by Defendants	0.30	\$550.00	\$165.00
Service	10/15/2023	revising opening	2.00	\$550.00	\$1,100.00
Service	10/16/2023	call w court	0.50	\$550.00	\$275.00
Service	10/16/2023	drafting second set of motions in liming	4.30	\$550.00	\$2,365.00
Service	10/16/2023	drafting motion in limine based on court conference	2.10	\$550.00	\$1,155.00
Service	10/16/2023	practicing opening	7.00	\$550.00	\$3,850.00
Service	10/16/2023	prepping client	1.50	\$550.00	\$825.00
Service	10/16/2023	organizing trial binder	5.40	\$550.00	\$2,970.00
Service	10/17/2023	trial	6.50	\$550.00	\$3,575.00
Service	10/17/2023	pre-trial prep	1.50	\$550.00	\$825.00
Service	10/17/2023	drafting cross of Quezada Sr.	4.50	\$550.00	\$2,475.00
Service	10/18/2023	trial	4.50	\$550.00	\$2,475.00
Service	10/18/2023	drafting cross of Jr.	2.80	\$550.00	\$1,540.00
Service	10/19/2023	researching and prepping for jury charge conference	5.00	\$550.00	\$2,750.00
Service	10/19/2023	charging conference	0.50	\$550.00	\$275.00
Service	10/20/2023	reviewing Defendants' opp to Plaintiff's proposed jury instruction	0.30	\$550.00	\$165.00

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Service	10/20/2023	drafting missing witness request	1.80	\$550.00	\$990.00
Service	10/20/2023	drafting summation	11.00	\$550.00	\$6,050.00
Service	10/21/2023	request to charge	1.00	\$550.00	\$550.00
Service	10/21/2023	drafting summation	8.40	\$550.00	\$4,620.00
Service	10/22/2023	revising and practicing summation	8.00	\$550.00	\$4,400.00
Service	10/23/2023	trial	5.50	\$550.00	\$3,025.00
Service	11/22/2023	reviewing motion for judgment as matter of law	1.30	\$550.00	\$715.00

Services Subtotal \$174,295.00

## **Expenses**

Type	Date	Notes	Notes Quantity		Total	
Expense	07/24/2020	Filing fee federal complaint	ling fee federal complaint 1.00			
Expense	06/07/2021	binding motion	1.00	\$18.10	\$18.10	
Expense	07/10/2021	shipping	1.00	\$26.95	\$26.95	
Expense	09/23/2021	transcripts	1.00	\$2,896.95	\$2,896.95	
Expense	10/10/2023	Supplies: staples - pictures for trial binders for court	1.00	\$18.63	\$18.63	
Expense	11/27/2023	Outside Services: esquire deposition solutions, October 16 2023	1.00	\$700.00	\$700.00	
Expense	11/27/2023	Outside Services: esquire deposition solutions, October 26 2023	1.00	\$525.00	\$525.00	
Expense	11/27/2023	Outside Services: esquire deposition solutions, October 31, 2023	1.00	\$525.00	\$525.00	

Expenses Subtotal \$5,110.63

**Subtotal** \$179,405.63

Total \$179,405.63

## **Detailed Statement of Account**

## **Current Invoice**

Invoice - 11/27/2023

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
	11/27/2023	\$179,405.63	\$0.00	\$179,405.63
			Outstanding Balance	\$179,405.63
			Total Amount Outstanding	\$179,405.63

Payment is due upon receipt.